

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	
)	Criminal No. 16-cr-10094-LTS
ROSS MCLELLAN)	
)	
Defendant)	
)	

**ASSENTED-TO MOTION FOR LEAVE TO FILE MOTION FOR REDUCTION OF
SENTENCE PURSUANT TO 18 U.S.C § 3582(c)(1)) PARTIALLY UNDER SEAL**

Now comes the Defendant Ross McLellan, by and through undersigned counsel, and hereby respectfully requests leave to file his Motion for Reduction of Sentence pursuant to 18 U.S.C § 3582(C)(1)) partially under seal. As grounds and reasons therefore, the defense states that portions of Mr. McLellan's motion contain private medical information and information relating to his children that should not be made public. Accordingly, the defense respectfully requests this Honorable Court's permission to file Mr. McLellan's motion partially under seal. A redacted copy will be filed on the public docket and an unredacted copy will be submitted to this Honorable Court and the Government.

WHEREFORE, the defense respectfully requests this Honorable Court to grant the foregoing request.

COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

The undersigned counsel conferred with counsel for the Government and the Government, by and through AUSA Stephen Frank, assents to this request.

Respectfully Submitted,

/s/ Martin G. Weinberg
Martin G. Weinberg
Mass. Bar No. 519480
20 Park Plaza, Suite 1000
Boston, MA 02116
(617) 227-3700
owlmgw@att.net

Dated: December 1, 2020

CERTIFICATE OF SERVICE

I, Martin G. Weinberg, hereby certify that on this date December 1, 2020, a copy of the foregoing documents has been served via Electronic Court Filing system on all registered participants.